

Submitted as testimony for bill 6313 to the Environmental Committee.

As many of you are aware, the incident at Town Farm Dairy in 2008 prompted the legislation for An Act Concerning Raw Milk. This incident was used to implement a pre existing agenda (*Quote from The Norwich Bulletin 1/19/09: Kasacek said increased regulations on raw milk has long been a department initiative. Twice since 1991, the department has proposed legislation that would ban raw milk, Sherman said.*) to eliminate raw milk from the state of Connecticut. Even though the Department of Agriculture states that they are not eliminating, but only limiting sales of raw milk; the legislation as written will effectively put raw milk dairy farmers out of business.

You can clearly see from the attached photo that Town Farm Dairy was in violation of the Laws and Regulations of labeling standards of retail raw milk.

From the Department of Agriculture website; Laws and Regulations, **AGRICULTURAL REGULATIONS (Title 22 Regulations of Connecticut State Agencies)**

Page 15 - Labeling Standards for Milk, Milk Products, Cheese and Retail Raw Milk

22-133-132. Retail Raw Milk. Labeling.

In addition to section 22-133-131 of the regulations of Connecticut State Agencies, retail raw milk labels shall comply with the following requirements:

(4) The consumer shall be informed of the risks involved with the consumption of raw or undercooked animal food by conspicuously labeling each container with the following advisory statement "Raw milk is not pasteurized, pasteurization destroys organisms that may be harmful to human health." The advisory statement shall be legible, in contrasting color from the label or contents and in type of no less one eighth (1/8) of an inch in height. The advisory statement shall be part of the label affixed to the container or printed on hangtags attached to the container;

You can also clearly see from the Connecticut Department of Health report in Connecticut Epidemiologist (http://www.ct.gov/dph/lib/dph/Vol29No2_FNL.pdf) that Town Farm Dairy had several practices and areas to be of concern: manual bottling of raw milk directly from the bulk tank, failure to cap valves, an improper seal around the shaft of the transport tank, and a biofilm protein residue found inside the transport tank. The LHD (local health department) identified conditions that indicated poor hygienic practices: 1) the stainless steel tube used to dispense raw milk directly from the bulk tank was stored in an exposed unsanitary bucket and would need to be sanitized before use; and 2) lack of hand soap, a malfunctioning hot water knob at the hand washing sink, soiled floors, and presence of flies in the bulk milk storage tank room. Staff personnel were also uncertain about the sanitization process of the dish machine that washes and sanitizes the glass bottles that are used and re-used for both pasteurized and/or raw milk when the customer returns the bottles. In addition, the raw milk bottles did not display the consumer advisory required by regulation; however, a consumer advisory with the language required by regulation was posted at the point of sale.

It does not take a scientist to conclude the following:

- The labeling of the raw milk sold by Town Farm Dairy did not comply with the law. http://www.ct.gov/dph/lib/dph/Vol29No2_FNL.pdf
- Practices at Town Farm Dairy that prompted the DOAG's legislation were less than acceptable.
- The outbreak was due to poor conditions, and not due to the milk itself.
- Raw milk properly labeled will inform the consumer as to what kind of milk they're purchasing. Proper labeling should be enforced instead of creating new laws.

The report from the Connecticut Department of Health ends by stating that the way to avoid E. coli and other infections is to basically live in a bubble. Not all bacteria are bad. Inform consumers through proper labeling – let them decide.



New York Times Feb. 24, 2008

Sign on cooler:

Raw milk in Red

"Raw Approved Milk" caps.

Sorry for the confusion